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PATENT APPLICATION

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IN THE  
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Cyril BRIGNONE et al.

Confirmation No.: 1932

Application No.: 10/698,708

Examiner: Azizul Q. CHOUDHURY

Filing Date: 10/30/2003

Group Art Unit: 2145

Title: DATA STRUCTURE DISPOSED IN A COMPUTER READABLE MEMORY THAT PROVIDES INFORMATION  
CORRESPONDING TO A LOCATION

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PO Box 1450  
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TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on 12/18/2008.

☒ The fee for filing this Appeal Brief is \$540.00 (37 CFR 41.20).

☐ No Additional Fee Required.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐ (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

☐ 1st Month  
\$130

☐ 2nd Month  
\$490

☐ 3rd Month  
\$1110

☐ 4th Month  
\$1730

☐ The extension fee has already been filed in this application.

☒ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$540. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

Respectfully submitted,

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Appellant:	BRIGNONE et al.	Patent Application	
Application No.:	10/698,709	Group Art Unit:	2145
Filed:	October 30, 2003	Examiner:	Choudhury, Azizul Q.

For: DATA STRUCTURE DISPOSED IN A COMPUTER READABLE MEMORY  
THAT PROVIDES INFORMATION CORRESPONDING TO A LOCATION

APPEAL BRIEF

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I. Real Party in Interest

The assignee of the present application is Hewlett-Packard Development Company,  
L.P.

## II. Related Appeals and Interferences

There are no related appeals or interferences known to the Appellants.

### III. Status of Claims

Claims 1-26 are rejected. This Appeal involves Claims 1-26.

#### IV. Status of Amendments

All proposed amendments have been entered. An amendment subsequent to the Final Office Action mailed September 18, 2008, has not been filed.

## V. Summary of Claimed Subject Matter

As recited in Claim 1, “[a] data structure disposed in a computer readable memory for providing information corresponding to a geographic location” is described. This embodiment is depicted at least in Figure 11. “Figure 11 depicts an exemplary data structure 1100 disposed in a computer memory 1150 for providing information corresponding to a location, according to one embodiment of the present invention” (page 53, lines 2-4). “Data structure 1100 comprises a first data field 1101. Data field 1101 functions to identify a location” (page 53, lines 6-7). “Data structure 1100 also comprises a second data field 1102. Data field 1102 comprises information corresponding to the location” (page 53, lines 7-8). “In one embodiment, the information comprising data structure 1100 is selectively provided to a client device on a network based on contextual information relating to a user of the client device” (page 53, lines 23-25).

As recited in Claim 10, “[a] network based system for selectively providing a data structure to a client device, said data structure having a first data field for identifying a location and a second data field associated with said first data field containing information corresponding to said location” is described. This embodiment is depicted at least in Figures 8A, 8B and 11. “In one embodiment, data structure 1100 functions as a virtual beacon (e.g., virtual beacon 850; Fig. 8B). Data structure 1100 comprises a first data field 1101. Data field 1101 functions to identify a location” (page 53, lines 4-7). “Data structure 1100 also comprises a second data field 1102. Data field 1102 comprises information corresponding to the location” (page 53, lines 7-8). “Through filter 825V, server 803 further receives contextual information 830V from the real world concerning the user. Contextual information 830V comprises, in one embodiment, information corresponding to contextual information

830R, which the user adds (or allows to be added) to a local (e.g., residing within real world 800R) database 841. However, the contextual information 830V received by filter 825V effectively comprises a version of contextual information 830R, which is sanitized (e.g., edited) to promote (e.g., safeguard, protect, etc.) the privacy of the user” (page 28, lines 16-23). “Virtual beacon server 803 connects virtual beacon database 802 to the Internet 810, such that the virtual beacons can be sent to serve intelligently. Any number of virtual beacon databases may be connected to the Internet 810 by virtual beacon server 803” (page 29, lines 16-19). “The information comprising set 830 can provide context and other information about the user by which server 803 makes virtual beacon 850 selectively available to the user of client device 820” (page 31, lines 20-22).

As recited in Claim 16, “[a] network based method for selectively providing a data structure, said data structure having a first data field for identifying a location and a second data field associated with said first data field containing information corresponding to said location, to a client device” is described. This embodiment is depicted at least in Figures 11 and 12. “Data structure 1100 comprises a first data field 1101. Data field 1101 functions to identify a location” (page 53, lines 6-7). “Data structure 1100 also comprises a second data field 1102. Data field 1102 comprises information corresponding to the location” (page 53, lines 7-8). “In one embodiment, the information comprising data structure 1100 is selectively provided to a client device on a network based on contextual information relating to a user of the client device.” (page 53, lines 23-25). “Figure 12 is a flowchart of a network based process 1200 for selectively providing a data structure (e.g., data structure 1100; Fig. 11) to a client device, according to one embodiment of the present invention. Process 1200 begins with step 1201, wherein context is sought that characterizes a user of the client device” (page

54, lines 23-27). “In step 1202, in response to seeking the context, the context is filtered so as to deter locating the user. Upon filtering the context, it is determined from the context whether the data structure is pertinent to the user. If it is determined that the data structure is pertinent to the user, then in step 1204, the data structure is sent to the client device” (page 55, lines 7-12).

As recited in Claim 22, “[a] data structure disposed in a computer readable memory for providing information corresponding to a geographic location” is described. This embodiment is depicted at least in Figure 11. “Figure 11 depicts an exemplary data structure 1100 disposed in a computer memory 1150 for providing information corresponding to a location, according to one embodiment of the present invention” (page 53, lines 2-4). “In one embodiment, a virtual beacon for selectively providing information relating to a point in three-dimensional space based on context relating to a user of a detector of the virtual beacon. The point in three-dimensional space corresponds to a unique geographical location, such as a latitude and a longitude. The information selectively provided can change dynamically in response to a condition described by the context. This condition relates to the dynamic pertinence of information with respect to the context and the receivability of the virtual beacon by the detector is activated and deactivated in response to the condition. This dynamic pertinence can be based on time or locational aspect of the detector” (page 52, lines 5-14). “Data structure 1100 comprises a first data field 1101. Data field 1101 functions to identify a location” (page 53, lines 6-7). “Data structure 1100 also comprises a second data field 1102. Data field 1102 comprises information corresponding to the location. In one embodiment, data field 1101 comprises a latitude and a longitude” (page 53, lines 7-9). “In one embodiment, the information comprising data structure 1100 is selectively provided to a client

device on a network based on contextual information relating to a user of the client device.”

(page 53, lines 23-25).

## VI. Grounds of Rejection to Be Reviewed on Appeal

1. Claims 1-9 and Claims 22-26 are rejected under 35 U.S.C. §101, as directed to non-statutory subject matter.

2. Claims 1-26 are rejected under 35 U.S.C. §102(e) as being anticipated by Tahtinen, et al. (U.S. Application Publication No. 2001/0046228), hereinafter referred to as “Tahtinen.”

## VII. Argument

### 1. Whether Claims 1-9 and 22-26 are directed toward non-statutory subject matter.

The Final Office Action mailed September 18, 2008, hereinafter referred to as the “instant Office Action,” asserts that Claims 1-9 and Claims 22-26 are rejected under 35 U.S.C. §101, as directed to non-statutory subject matter. Specifically, Claims 1-9 and 22-26 are rejected because the claimed data structure is disposed in a computer readable memory, which is not statutory.

The instant Office Action states: “A data structure is statutory when it is functional. For example if the data structure were to increase efficiency, then that data structure would be statutory” (instant Office Action; page 2, lines 9-11).

Appellants respectfully note that MPEP §2106.01 states in part (emphasis added):

Descriptive material can be characterized as either “functional descriptive material” or “nonfunctional descriptive material.” In this context, “functional descriptive material” consists of data structures and computer programs which impart functionality when employed as a computer component. (The definition of “data structure” is “a physical or logical relationship among data elements, designed to support specific data manipulation functions.” The New IEEE Standard Dictionary of Electrical and Electronics Terms 308 (5th ed. 1993).)

...  
(“[E]ach invention must be evaluated as claimed; yet semantogenic considerations preclude a determination based solely on words appearing in the claims. In the final analysis under § 101, the claimed invention, as a whole, must be evaluated for what it is.”) (quoted with approval in *Abele*, 684 F.2d at 907, 214 USPQ at 687). See also *In re Johnson*, 589 F.2d 1070, 1077, 200 USPQ 199, 206 (CCPA 1978) (“form of the claim is often an exercise in drafting”). ...

USPTO personnel should inquire whether there should be a rejection under 35 U.S.C. 102 or 103. USPTO personnel should determine whether the claimed nonfunctional descriptive material be given patentable weight. USPTO personnel must consider all claim limitations when determining patentability of

an invention over the prior art. *In re Gulack*, 703 F.2d 1381, 1385, 217 USPQ 401, 403-04 (Fed. Cir. 1983).

Appellants respectfully submit that the rejection of the claims is improper as the Claims 1-9 and 22-26 satisfy the requirements of 35 U.S.C. §101 as laid out in MPEP §2106.01 cited above.

Independent Claim 1 recites (emphasis added):

1. A data structure disposed in a computer readable memory for providing information corresponding to a geographic location, said data structure comprising:  
a first data field for identifying said location; and  
a second data field associated with said first data field for containing said information, wherein a user can access said information.

Claim 22 has similar embodiments. Moreover, Claims 2-9 that depend from independent Claim 1 and Claims 23-26 that depend from independent Claim 22 also include these embodiments.

Appellants respectfully submit that a “data structure disposed in a computer readable memory for providing information” and “wherein a user can access said information” meets the definition of a data structure laid out in MPEP §2106.01, a “data structure” being “a physical or logical relationship among data elements, designed to support specific data manipulation functions” (MPEP §2106.01; emphasis added). Here, as recited in Claim 1, the “data structure” is “disposed in a computer readable memory” to “provide information” such that “a user can access said information.” Appellants respectfully submit that “providing information” so that “a user can access said information” are such “specific data manipulation functions.” Moreover, Appellants respectfully submit that the “data structure” as claimed is “a physical or logical relationship among data elements, designed to support” these functions,

because the data structure comprises “a first data field ...” and “a second data field associated with said first data field ...,” the logical relationship between these two data fields being their mutual association. Therefore, Appellants respectfully submit that Appellants’ “data structure” is statutory because it is functional in that the claimed “data structure” provides “associated” information so that it is accessible to a user.

Therefore, Appellants respectfully assert that independent Claims 1 and 22 recite to statutory subject matter under 35 U.S.C. §101, and as such are in condition for allowance. As Claims 2-9 depend from Claim 1 and Claims 23-26 depend from Claim 22, Appellants respectfully submit that Claims 1-9 and Claims 22-26 overcome the above rejection.

1. Whether Claims 1-26 are anticipated by Tahtinen under 35 U.S.C. §102(e).

The instant Office Action states that Claims 1-26 are rejected under 35 U.S.C. §102(e) as being anticipated by Tahtinen. Appellants have reviewed Tahtinen and respectfully submit that the embodiments as recited in Claims 1-26 are not anticipated by Tahtinen in view of at least the following rationale.

MPEP §2131 provides:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ... “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

Appellants respectfully submit that the rejection of the claims is improper as the rejection of Claims 1-26 does not satisfy the requirements of a *prima facie* case of anticipation as claim

embodiments are not met by Tahtinen. Appellants respectfully submit that Tahtinen does not teach or suggest the claimed embodiments in the manner set forth in independent Claims 1, 10, 16 and 22.

Independent Claim 1 is recited above. Independent Claims 10, 16 and 22 recite similar embodiments to Claim 1. Moreover, Claims 2-9 that depend from independent Claim 1, Claims 11-15 that depend from independent Claim 10, Claims 17-21 that depend from independent Claim 16 and Claims 23-26 that depend from independent Claim 22 also include these embodiments. Appellants respectfully submit that Tahtinen does not teach, describe or suggest “A data structure disposed in a computer readable memory for providing information corresponding to a geographic location ... comprising: a first data field for identifying said location; ...” as claimed (emphasis added).

The instant Office Action, states in part (paragraph 1, page 3): “ ... Tahtinen teaches a data structure disposed in a computer readable memory for providing information corresponding to a geographic location, said data structure comprising: a first data field for identifying said location (equivalent to coordinate information, paragraph 4, Tahtinen); and a second data field associated with said first data field for containing said information, wherein a user can access said information (equivalent to subscriber number, paragraph 4, Tahtinen).” Similar bases for rejection are found in the instant Office Action at paragraph 10, page 6 with respect to Claim 10, at paragraph 11, page 6 with respect to Claim 16, and at paragraph 12, page 7 respect to Claim 22.

The instant Office Action asserts that Tahtinen teaches the embodiment, “geographical location,” in the claim language of Claim 1 as found in Tahtinen at paragraph [0004]:

[0004] The present invention is based on implementing the selection of a telephone network subscriber by means of an addressable point in the coordinate space of a given virtual-reality world, which in practice means that there exists a data structure in which the subscriber number information is associated with a certain point of the coordinate space of the virtual-reality world. ...” (Emphasis added.)

Appellants do not understand Tahtinen to teach a “geographical location” as “an addressable point in the coordinate space of a given virtual-reality world.”

Rather, referring to Tahtinen’s title, and abstract, amongst other places, Appellants understand Tahtinen to teach (Abstract of Tahtinen):

“The present invention relates to a method and arrangement for interconnecting a virtual-reality world (3) and the real world (7) for the purpose of establishing a real-time communications connection such as a telephone call connection. According to the method, a three-dimensional virtual-reality world (3) is formed. According to the invention, a subscriber of the real-world telephone network (7) is selected on the basis of a point in the coordinate space of the virtual-reality world (3), and the connection is established from the user (1) to the real-world telephone network subscriber (7) over the same communications channel as is used for establishing the connection toward the virtual-reality world (3).” (Emphasis added.)

Appellants respectfully submit that Tahtinen does not mention a “geographical location” and therefore Appellants do not understand Tahtinen to teach a “data structure ... for providing information corresponding to a geographic location, ... comprising: a first data field for identifying said location,” as recited by Appellants’ Claim 1 (emphasis added).

Instead, Appellants understand Tahtinen to teach, as cited above in Abstract of Tahtinen, “a method and arrangement for interconnecting a virtual-reality world (3) and the real world (7)” wherein “a subscriber of the real-world telephone network (7) is selected on the basis of a point in the coordinate space of the virtual-reality world (3), and the connection is established

from the user (1) to the real-world telephone network subscriber (7) ...” Appellants’ note that Tahtinen teaches “a point in the coordinate space of the virtual-reality world (3)” and does not teach that the “point in the coordinate space” is in the “real world.” Rather, Tahtinen teaches in the Abstract of Tahtinen that the “real world” is separate and distinct from the “virtual-reality world,” for example, when Tahtinen in the Abstract states “a method and arrangement for interconnecting a virtual-reality world (3) and the real world (7),” see also FIG. 1 and the discussion thereof in paragraphs [0010] through [0012] of Tahtinen.

Moreover, in paragraph [0012], Tahtinen teaches (emphasis added):

“[0012] By navigating to a desired point in the virtual-reality world 3, the user 1 can address, via coordinate points x,y,z of the three-dimensional virtual-reality world 3, the subscribers 7 of the real-world telephone network 9 associated with said coordinate points, thus establishing a voice connection to said subscribers if so desired. ...”

The instant Office Action states on pages 9 and 10 that “the Tahtinen prior art is applicable because it teaches the data structure containing coordinates which are geographic locations” (page 9, line 22, through page 10, line 2). If Tahtinen’s “point in the coordinate space” were in the “real world” as the instant Office Action seems to suggest by equating Tahtinen’s “point in the coordinate space” to Appellants “geographical location,” Appellants fail to understand why Tahtinen would specifically state that the location of the “point in the coordinate space” is in “the virtual-reality world.” Moreover, Appellants fail to understand the instant Office Action’s seeming contention that a “geographical location” of an entity in the real world, for example, given in latitude and longitude on the surface of the Earth, could possibly be located in a “virtual-reality world,” such as Tahtinen’s “virtual-reality world.”

Appellants respectfully submit that Tahtinen does not disclose nor teach “A data structure disposed in a computer readable memory for providing information corresponding to a geographic location, said data structure comprising: a first data field for identifying said location; and a second data field associated with said first data field for containing said information, wherein a user can access said information,” as claimed (emphasis added). Therefore, Appellants submit that Tahtinen fails to disclose each and every element of Claim 1, arranged as required by the Claim. As similar embodiments are found in independent Claims 10, 16 and 22, Appellants respectfully assert that Tahtinen does not teach, disclose or suggest the claimed embodiments as recited in independent Claims 10, 16 and 22. As the

claimed embodiments are not met by Tahtinen, Appellants respectfully submit that the rejection does not satisfy the requirements of a *prima facie* case of anticipation. Therefore, Appellants respectfully submit that Claims 10, 16 and 22 overcome the rejection under 35 U.S.C. § 102(e), and that these claims are thus in a condition for allowance.

Claims 2-9 depend from independent Claim 1; Claims 11-15 depend from independent Claim 10; Claims 17-21 depend from independent Claim 16; and Claims 23-26 depend from independent Claim 22. Therefore, Appellants respectfully submit that Claims 2-9, Claims 11-15, Claims 17-21 and Claims 23-26 also overcome the rejection under 35 U.S.C. § 102(e), and are in a condition for allowance as being dependent on allowable base claims.

Conclusion

Appellants believe that pending Claims 1-9 and 22-26 are directed toward patentable subject matter under 35 U.S.C. § 101, and that Claims 1-26 are not anticipated by Tahtinen under 35 U.S.C. § 102(e). As such, Appellants respectfully request that the rejections of Claims 1-26 be reversed.

The Appellants wish to encourage the Examiner or a member of the Board of Patent Appeals to telephone the Appellants' undersigned representative if it is felt that a telephone conference could expedite prosecution.

Respectfully submitted,  
WAGNER BLECHER LLP

Dated: February 18, 2009

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### VIII. Appendix - Clean Copy of Claims on Appeal

1. A data structure disposed in a computer readable memory for providing information corresponding to a geographic location, said data structure comprising:  
  
a first data field for identifying said location; and  
  
a second data field associated with said first data field for containing said information, wherein a user can access said information.
  
2. The data structure as recited in Claim 1 wherein said information is selectively provided to a client device on a network based on context relating to a user of said client device, wherein said context is subject to filtering and wherein said filtering functions to determine locating said user.
  
3. The data structure as recited in Claim 2 wherein said context changes dynamically in response to a condition relating to the temporal pertinence of said information with respect to said contextual information and wherein the receivability of said data structure to said client device is activated or deactivated in response to said condition.
  
4. The data structure as recited in Claim 3 wherein said condition comprises a quality selected from the group consisting essentially of time and a locational aspect of said client device.
  
5. The data structure as recited in Claim 4 wherein said locational aspect comprises a state selected from the group consisting essentially of directional orientation, tilt orientation,

residing within a specified area of coverage, motion through said specified area of coverage, and accessibility of said location to a position of said client device.

6. The data structure as recited in Claim 5 wherein said condition comprises a sequence of events occurring and wherein said area of coverage changes dynamically in response to said sequence of events.

7. The data structure as recited in Claim 2 wherein said context comprises an attribute of said user, said attribute selected from the group consisting essentially of identity, profile, history, a preference, a credential, capability, an interest, and a privacy selection.

8. The data structure as recited in Claim 2 wherein said client device comprises a portable computing device and wherein said context is stored on said portable computing device.

9. The data structure as recited in Claim 2 wherein said first data structure comprises a latitude and a longitude wherein said second data field is selected from the group consisting essentially of a uniform resource locator and a telephone number.

10. A network based system for selectively providing a data structure to a client device, said data structure having a first data field for identifying a location and a second data field associated with said first data field containing information corresponding to said location, comprising:

a filter coupled to said network for accessing context stored at said client device and on the basis of said context determining that said data structure is pertinent to a user of said client device and wherein said filter functions to deter locating said user;

a server coupled to said network for selectively furnishing said data structure to said client device on the basis of said determining; and

a database coupled to said server for storing a plurality of said data structures and providing said data structure to said server.

11. The system as recited in Claim 10 wherein said context changes dynamically in response to a condition relating to the temporal pertinence of said information with respect to said context and wherein the receivability of said data structure to said client device is activated or deactivated in response to said condition.

12. The system as recited in Claim 11 wherein said condition comprises a quality selected from the group consisting essentially of time and a locational aspect of said client device.

13. The system as recited in Claim 12 wherein said locational aspect comprises a state selected from the group consisting essentially of directional orientation, tilt orientation, residing within a specified area of coverage, motion through said specified area of coverage, and accessibility of said location to a position of said client device.

14. The system as recited in Claim 13 wherein said condition comprises a sequence of events occurring and wherein said area of coverage changes dynamically in response to said sequence of events.

15. The system as recited in Claim 10 wherein said context comprises an attribute of said user, said attribute selected from the group consisting essentially of identity, profile, history, a preference, a credential, capability, an interest, and a privacy selection.

16. A network based method for selectively providing a data structure, said data structure having a first data field for identifying a location and a second data field associated with said first data field containing information corresponding to said location, to a client device, said method comprising:

in response to a request from said client device, seeking context that characterizes a user of said client device;

in response to said seeking, filtering said context to determine locating said user;

upon said filtering, determining from said context that said data structure is pertinent to said user, and

in response to said determining, sending said data structure to said client device.

17. The method as recited in Claim 16 wherein said context changes dynamically in response to a condition relating to the temporal pertinence of said information with respect to said context and wherein the receivability of said data structure to said client device is activated or deactivated in response to said condition.

18. The method as recited in Claim 17 wherein said condition comprises a quality selected from the group consisting essentially of time and a locational aspect of said client device.

19. The method as recited in Claim 18 wherein said locational aspect comprises a state selected from the group consisting essentially of directional orientation, tilt orientation, residing within a specified area of coverage, motion through said specified area of coverage, and accessibility of said location to a position of said client device.

20. The method as recited in Claim 19 wherein said condition comprises a sequence of events occurring and wherein said area of coverage changes dynamically in response to said sequence of events.

21. The method as recited in Claim 16 wherein said context comprises an attribute of said user, said attribute selected from the group consisting essentially of identity, profile, history, a preference, a credential, capability, an interest, and a privacy selection.

22. A data structure disposed in a computer readable memory for providing information corresponding to a geographic location, said data structure comprising:

a first data field for identifying said location with respect to a three dimensional reference system, wherein said three dimensional reference system is based selectively on an absolute reference and a relative reference; and

a second data field associated with said first data field for containing said information, wherein a user can access said information.

23. The data structure as recited in Claim 22 wherein said first data structure comprises a latitude, a longitude, and an altitude wherein said second data field is selected from the group consisting essentially of a uniform resource locator and a telephone number.

24. The data structure as recited in Claim 22 wherein said first data structure comprises a plurality of fields wherein said fields identify said geographic location, wherein said absolute reference comprises a plurality of coordinate systems, and wherein each field of said plurality of fields is defined in a separate coordinate system of said plurality of coordinate systems.

25. The data structure as recited in Claim 22 wherein said first data structure comprises a plurality of fields wherein said fields identify said geographic location, wherein said relative reference comprises a plurality of coordinate systems, and wherein each field of said plurality of fields is defined in a separate coordinate system of said plurality of coordinate systems.

26. The data structure as recited in Claim 22 wherein said first data structure comprises a plurality of fields wherein said fields identify said geographic location, wherein each field of said plurality of fields is defined in a separate coordinate system of said plurality of coordinate systems, and wherein a first field of said plurality of fields is defined based on said absolute reference and a second field of said plurality of fields is defined based on said relative reference.

IX. Evidence Appendix

None. No evidence is herein appended.

X. Related Proceedings Appendix

None. No related proceedings are herein appended.